Revised 02/03

CORRES CONTROL
INCOMING LTR NO

C0436 RF03

DUE DATE
ACTION

DIST	LTR	ENC
BERARDINI, J. H.	X	X
BOGNAR, E. S.	X	X
CROCKETT, G. A.		
DECK, C. A.		
DEGENHART, K. R.		
DIETER, T. J.		
DIETERLE, S. E.	X	X
FERRERA, D. W.	X	X
FERRI, M. S.		
GERMAIN, A. L.		
GIACOMINI, J. J.		
ISOM, J. H.		
LINDSAY, D. C.		
LONG, J. W.		
LYLE, J. L.		
MARTINEZ, L. A.	X	X
NAGEL, R. E.	X	X
NORTH, K.		
PARKER, A. M.		
POWERS, K. P.		
RODGERS, A. D.		
SHELTON, D. C.	X	X
SPEARS, M. S.		
TRICE, K. D.		
TUOR, N. R.		
WILLIAMS, J. L.		
BUTLER, L.	X	X
COR. CONTROL	X	X
ADMN. RECORD	X	X
PATS/130		

Reviewed for Addressee
Corres Control RFP

5/8/03 Date By:

Ref Ltr #

DOE ORDER #
5400.1

1/4

RECEIVED

2003 MAY -8 A 10:2 CORRESPONDENCE CONTROL

STATE OF COLORADO

Bill Owens, Governor
Douglas H Benevento, Executive Director

Dedicated to protecting and improving the health and environment of the people of Colorado

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(303) 692-3090

Colorado Department
of Public Health
and Environment

May 5, 2003

Richard J. DiSalvo
Acting Assistant Manager for Environment and Stewardship
U S Department of Energy
Rocky Flats Field Office
10808 Highway 93, Unit A
Golden, Colorado 80403-8200

RE: Approval, Final Industrial Area Sampling and Analysis Plan FY03 Addendum #IA-03-05, IHSS Group 500-4, dated April 2003

Dear Mr DiSalvo·

The Colorado Department of Public Health and Environment, Hazardous Materials and Waste Management Division (the Division) has reviewed the subject sampling and analysis plan addendum. The draft addendum, dated March 2003, was reviewed and comments were provided to, and discussed with, facility representatives on April 17, 2003 A copy of your prime contractor's responses to the Division's comments is attached for ready reference

Concerns regarding a retention pond associated with Building 553, raised informally at the meeting, will be addressed in the IHSS Group 500-2 SAP Addendum currently in review Other general or implementation issues i e auger refusal and step-out sampling, have been satisfactorily addressed in the responses

Per Appendix C of the Industrial Area SAP (IASAP) beryllium scrap metal was "released" within IHSS 117 2 Beryllium has not been detected above background levels However, field XRF, by Method 6200 (http://www.epa gov/epaoswer/hazwaste/test/pdfs/6200 pdf) is incapable of detecting beryllium. Given the nature of the release, the Division agrees that QA samples, approximately twelve in number analyzed by Method 6010, will provide a sufficient initial evaluation for the metal Results from those samples will be used to determine whether additional evaluation for beryllium will become necessary

If you have any questions regarding this correspondence, please contact me at (303) 692-3367, Harlen Ainscough at 303-692-3337 or David Kruchek at (303) 692-3328

Sincerely,

Steven H Gunderson
RFCA Project Coordinator

MAY 2003
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RECORDS CENTER

ADMIN RECORD

IA-A-001466

Attachment

cc Norma Castaneda, DOE
Tim Rehder, EPA
Lane Butler, KH
Dave Shelton, KH
Mark Sattelberg, U S F&W
Administrative Records Building T130G

Response to Colorado Department of Public Health and Environment
Hazardous Materials & Waste Management Division
Comments on
Draft Industrial Area Sampling and Analysis Plan
FY 03 Addendum #IA-03-05 (IHSS Group 500-4)
March 2003

General Comments:

1. The need to collect data from specified horizons requires that the alternate sampling techniques be employed when necessary The potential for auger refusal in this locale should be considered before work is initiated

Sampling methods are defined in the IASAP We do not anticipate having problems such as auger refusal at this IHSS No edits to the text are required

2. Sampling depths and analytes in the northeast corner of the IHSS are based on the occurrence of VOCs at a sample location northeast of the IHSS What provisions are or will be made to ensure that "step-out" sampling from that occurrence is not limited, ultimately, to sampling within the IHSS?

As stated in the Addendum, the proposed sampling locations are a starting point As always, additional samples will collected as needed S Serreze will research the B553 gravel-lined pit and complete edits if required

3. Beryllium scrap metal is included in the IASAP, Appendix C as a COC The available data indicate that the metal has not been detected above background mean plus two standard deviations Table 1 shows Onsite Lab Method 6200 and Offsite Lab Method 6010, under what circumstances will one or both methods be used and which has the greatest veracity for quantifying the "light" metals of interest? Please address

An offsite laboratory will be used for beryllium analyses if beryllium is a COC If beryllium is not a COC, the offsite QA samples will be used

4 Please ensure that all field and laboratory quality control/assurance protocols set forth in the IASAP, or pertinent documents, are followed

All laboratory QA/AC controls in the IASAP will be followed No edits to the text are required

Specific Comments:

5. Section 2.1, page 2, 2nd para - Relative to the second paragraph, first sentence, please revise as follows, "This VOC containing sample point was the only subsurface sample above MDLs, no subsurface sample exceeded a constituent background mean plus two standard deviations "

3

This text will be changed to the following "This VOC-containing sample point was the only subsurface sample above MDLs, no subsurface sample exceeded a constituent background mean plus two standard deviations "

6. 3rd[nd] para , last sentence – The narrative states that two statistical samples within IHSS 169 will be sampled to a depth of four feet Thus, it appears that CB40-018 (Interval C), listed in Table 1, page 11, and shown on Figure 3 is extraneous to CB40-015 and CB40-016. If a third sample to four feet is intended or desired, CB41-003 appears to be better located relative to IHSS 169 Please address

The text will be changed to indicate that two samples will be collected at a depth of four feet. Additionally, the "C" interval for sampling location CB40-018 was deleted from Table 1

7. Table 1, page 25, Please change Location Code "CB-42-014F" to CB-42-013F. A location CB-42-014F is not shown on Figure 3 and it is apparent that CB-42-013 should include interval F from 8 5 to 10.5 feet.

Table 1 will be changed from CB42-014F to CB42-013F

8. Figure 3, If staining or field instruments indicate, additional biased samples in the southwest and southeast corners should be added while the field crew is present rather than awaiting laboratory results

This is as stated in the IASAP and addendum.

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